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17 UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

18 WHITEWATER DRAW NATURAL  
19 RESOURCE CONSERVATION  
DISTRICT, *et al.*,

20 Plaintiffs,

21 v.

22 JOHN F. KELLY, *et al.*,

23 Defendants.  
24  
25  
26  
27

Case No. 3:16-cv-2583

**FEDERAL DEFENDANTS' NOTICE  
OF MOTION AND MOTION TO  
STAY THE LITIGATION OR, IN THE  
ALTERNATIVE, FOR AN  
EXTENSION OF TIME FOR  
FEDERAL DEFENDANTS  
TO RESPOND TO COMPLAINT**

Date: July 3, 2017  
Time: 10:30 a.m.  
Courtroom: 5B

No Oral Argument Unless Requested by  
the Court

Hon. H. James Lorenz

1 PLEASE TAKE NOTICE THAT on July 3, 2017, at 10:30 a.m., before the  
2 Honorable H. James Lorenz, in Courtroom 5B of the United States Courthouse for  
3 the Southern District of California, located at 221 West Broadway, San Diego,  
4 California, John F. Kelly, Secretary of Homeland Security, and the United States  
5 Department of Homeland Security will and hereby do move the Court to stay this  
6 case and all pending deadlines until September 7, 2017.

7 Because two recently issued Executive Orders require the Department of  
8 Homeland Security to review and potentially “rescind[] or revise” many of the  
9 immigration-related policies at issue here, potentially rendering much of Plaintiffs’  
10 complaint moot, Federal Defendants respectfully move this Court under Local  
11 Rule 7.1 to stay this case and all pending deadlines until that review is concluded.  
12 Federal Defendants request that this stay remain in place until September 7, 2017,  
13 45 days after the conclusion of the review period the Executive Orders require. At  
14 the end of the stay, the parties will submit a joint status report concerning further  
15 proceedings in this matter.

16 If this motion is denied, Federal Defendants request 21 days from the date of  
17 the Court’s Order to respond to the Complaint.

18 A Memorandum of Points and Authorities and in Support of this Motion is  
19 filed herewith.

20 This Motion is based upon this Notice and Motion, the accompanying  
21 Memorandum of Points and Authorities, the Exhibits filed in support of this  
22 Motion, and upon such other evidence as may be received by the Court.  
23

24 Dated: June 1, 2017

Respectfully submitted,

25 JEFFREY H. WOOD  
26 Acting Assistant Attorney General  
27 Environment & Natural Resources Division

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